

Deficiencies and Corrective Actions **For Plumas County Environmental Health**

Update 1 Submitted: 12/26/06

Update 2 Submitted: 04/02/07

Update 3 Submitted: 07/02/07

1. **Deficiency:** Plumas County Environmental Health is not adequately assessing the CalARP facility surcharge fee.

CUPA Corrective Action (update 1): Plumas County has (2) facilities subject to the CalARP surcharge. Both facilities have been assessed the CalARP surcharge.

Cal/EPA Response: Cal/EPA considers this deficiency corrected no further updates are necessary.

2. **Deficiency:** Plumas County Environmental Health is not annually reviewing or summarizing their review of their Unified Inspection and Enforcement Plan.

CUPA Corrective Action (update 1): The Plumas County CUPA Inspection and Enforcement Plan has been reviewed. A copy of the revised Businesses and Frequency of Inspections is attached. Revisions will be included in the FY 06/07 CUPA Self-Audit.

Cal/EPA Response: The CUPA's corrective action for this deficiency is sufficient. Cal/EPA considers this deficiency corrected; no further updates are necessary.

3. **Deficiency:** Plumas County Environmental Health is not adequately regulating one of the CalARP facilities. The CUPA has been working with the facility to switch to an alternative non-regulated substance. Since FY 03/04 the CUPA has been working with this facility to utilize an alternative non-regulated substance. However, the facility is still using a regulated substance and not fully complying with the CalARP program requirements.

CUPA Corrective Action (update 1): The facility manager has indicated that a suitable alternative non-regulated substance for their process has not been identified and that the facility will comply with CalARP program requirements. The Plumas County CUPA will continue to work

cooperatively with the facility to gain compliance. Enforcement action will be initiated if the facility fails to begin CalARP compliance by April '07.

Cal/EPA Response: Cal/EPA is pleased with the progress the CUPA is making towards correcting this deficiency; however, Cal/EPA will continue to track this deficiency. Provide Cal/EPA with an update on the corrective actions in the next progress report due April 2, 2007.

CUPA Corrective Action (Update 2): *We have been contacted by a consultant hired by the facility; a RMP for the facility is being developed.*

Cal/EPA Response to Update 2: Cal/EPA is pleased with the progress the CUPA is making towards correcting this deficiency; however, Cal/EPA will continue to track this deficiency. Provide Cal/EPA with an update on the corrective actions in the next progress report due July 1, 2007.

CUPA Corrective Action (Update 3): The Facility has submitted a RMP to this department and is under initial review.

Cal/EPA Response to Update 3: The corrective action for this deficiency is sufficient. Cal/EPA considers this deficiency corrected; no further updates are necessary.

4. Deficiency: Not all of the CUPA files contain current permits.

CUPA Corrective Action: To date, (113) of Plumas Counties (185) Business Plan files have been reviewed and updated as needed. A complete review of all (185) files is expected by March '07.

Cal/EPA Response: Cal/EPA is pleased with the progress the CUPA is making towards correcting this deficiency. Cal/EPA will continue tracking this deficiency. Provide Ca/EPA with an update on the progress in the next progress report due April 2, 2007.

CUPA Corrective Action (Update 2):

The review of all Plumas County Business Plan files has been completed, all permits have been issued.

Cal/EPA Response to Update 2: Cal/EPA considers this deficiency corrected no further updates are necessary.

5. Deficiency: Not all of the CUPA files contain current business plan inventories or emergency response procedures. Approximately 75% of the files were missing these elements. For the emergency response procedures, the CUPA sent letters requesting this information on August 24, 2006

CUPA Corrective Action: Requests for Business Plan and Emergency Response Plan updates are sent to operators/owners during the Program billing cycle. As of 12/26/06 (85) Plan updates have been received and all (185) facilities have been contacted with Plan update requests. Follow-up/Reminder letters are to be sent in January '07 to facilities who have not responded.

Cal/EPA Response: Cal/EPA is pleased with the progress the CUPA is making towards correcting this deficiency. Cal/EPA will continue tracking this deficiency. Provide Ca/EPA with an update on the progress in the next progress report due April 2, 2007.

CUPA Corrective Action (Update 2): *We continue to work towards full compliance with all our facilities. Follow-up/Reminder letters were mailed in January '07, and again in March '07 to facility owners/operators. To date, (166) of (185) Plumas County facilities have submitted updated Business Plans and Emergency Response Plans.*

Cal/EPA Response to Update 2: Cal/EPA considers this deficiency corrected no further updates are necessary.

6. **Deficiency:** Plumas County Environmental Health is not accurately reporting the number of facilities with violations. The CUPA has developed tracking spreadsheets to document violations and return to compliance. However, the number of facilities with violations identified in the tracking spreadsheet is not reflective on their annual summary report

CUPA Corrective Action: Tracking spreadsheets are continually updated as facilities are inspected and inspection follow-up letters are sent. The tracking spreadsheets will be used to check Annual Summary Reporting numbers of violations.

Cal/EPA Response: The CUPA's corrective action for this deficiency is sufficient. Cal/EPA considers this deficiency corrected; no further updates are necessary.